

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

THIS DOCUMENT RELATES TO:
Plaintiffs' Master Administrative Class
Action Complaint for Medical Monitoring

**DEFENDANTS NATIONAL FOOTBALL LEAGUE'S AND NFL PROPERTIES
LLC'S MOTION TO DISMISS THE MASTER ADMINISTRATIVE CLASS
ACTION COMPLAINT ON PREEMPTION GROUNDS**

Defendants National Football League and NFL Properties LLC (collectively, the "NFL Defendants") move pursuant to Federal Rules of Civil Procedure 12(b)(6) to dismiss, with prejudice, Plaintiffs' Administrative Class Action Complaint for Medical Monitoring, and the Original Class Action Complaint for Plaintiffs Allen, Kowalewski, Little, Wooden & Fellows on preemption grounds. In support of this motion, the NFL Defendants rely on the points and authorities in the accompanying memorandum of law, and the accompanying Declaration of Dennis L. Curran and exhibits thereto, which the NFL Defendants submit herewith and incorporate herein in their entirety.

The NFL Defendants respectfully request oral argument on this motion.

Respectfully submitted,

Dated: August 30, 2012

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CERTIFICATE OF SERVICE

I, Nathan M. McClellan, hereby certify that on August 30, 2012, I electronically filed the foregoing Motion to Dismiss the Master Administrative Class Action Complaint on Preemption Grounds, the Memorandum of Law in support thereof, the Declaration of Dennis L. Curran, and the associated exhibits, and electronically served them via the Court's CM/ECF system on all counsel of record.

Dated: August 30, 2012

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